XLINKS MOROCCO-UK POWER PROJECT

Preliminary Environmental Information Report

Volume 1, Appendix 3.1: Draft Mitigation Schedule

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Glossary

Term	Meaning
Access land	The Countryside and Rights of Way Act 2000 gives a public right of access to land mapped as 'open country' (mountain, moor, heath and down) or registered common land. These areas are known as ‘access land'.
Alverdiscott Substation Connection Development	The development required at the existing Alverdiscott Substation site, which is envisaged to include development of a new 400 kV substation, and other extension modification works to be confirmed by National Grid Electricity Transmission.
Biodiversity Net Gain	An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected to ensure that the current loss of biodiversity through development will be halted and ecological networks can be restored.
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Construction Environmental Management Plan	A document detailing the overarching management principles for construction, which includes construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Converter Site	The Converter Site is proposed to be located to the immediate west of the existing Alverdiscott Substation site in north Devon. The Converter Site would contain two converter stations (known as Bipole 1 and Bipole 2) and associated infrastructure, buildings and landscaping.
Converter station	Part of an electrical transmission and distribution system. Converter stations convert electricity from Direct Current (DC) to Alternating Current (AC), or vice versa.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Earthworks	Covers the processes of soil-stripping, ground-levelling, excavation, and landscaping, as defined by the Institute of Air Quality Management.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
HVAC Cables	The High Voltage Direct Current (HVDC) cables which would bring electricity to the UK converter stations from the Moroccan converter stations.
HVDC Cables	The High Voltage Alternating Current (HVAC) cables which would bring electricity from the converter stations to the new Alverdiscott Substation Connection Development.
Landfall	The proposed area in which the offshore cables make landfall in the United Kingdom (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Cornborough Range, Devon, between Mean Low Water Springs and the Transition Joint Bay inclusive of all construction works, including the offshore and onshore cable routes, and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and

Term	Meaning
	County Borough Councils. The relevant Local Authorities for the Proposed Development are Devon County Council and Torridge District Council.
Main Rivers	The term used to describe a watercourse in respect of which the Environment Agency has permissive powers in relation to its management.
Offshore Cable Corridor	The proposed corridor within which the offshore cables are proposed to be located, which is situated within the United Kingdom Exclusive Economic Zone.
Onshore HVDC Cable Corridor	The proposed corridor within which the onshore High Voltage Direct Current cables would be located.
Onshore Infrastructure Area	The proposed infrastructure area within the Proposed Development Draft Order Limits landward of the transition joint bays, which contains the onshore HVDC Cables, Converter Site, the Alverdiscott Substation Connection Development, highway works, utility diversions and onshore HVAC Cables.
Ordinary Watercourses	A river, stream, ditch, cut, sluice, dyke or non-public sewer that is not designated a main river and for which the Local Planning Authority has flood risk management responsibilities and powers.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Proposed Development	The element of the Xlinks Morocco-UK Power Project within the UK, which includes the offshore cables (from the UK Exclusive Economic Zone to landfall), landfall site, onshore Direct Current and Alternating Current cables, converter stations, road upgrade works and, based on current assumptions, the Alverdiscott Substation Connection Development.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Runoff	Runoff occurs when there is more water than land can absorb. The excess liquid flows across the surface of the land.
Site of Special Scientific Interest	A site designation specified and protected in the Wildlife and Countryside Act 1981. These sites are of particular scientific interest due to important biological (e.g. a rare species of fauna or flora), geological or physiological features.
Site Waste Management Plan	A site waste management plan aims to establish and estimate how much waste is produced by the Proposed Development and sets out how resources will be managed and waste controlled at all stages during construction activities.
Toolbox talk	A short presentation to the workforce of a single aspect of health and safety.
Trackout	The transport of dust and dirt from the construction/demolition site onto the public road network, where it may be deposited and then re-suspended by vehicles using the network, as defined by the Institute of Air Quality Management.
Vessel Monitoring System	A system used in commercial fishing to allow environmental and fisheries regulatory organizations to monitor, minimally, the position, time at a position, and course and speed of fishing vessels.
Xlinks Morocco UK Power Project	The overall scheme from Morocco to the national grid, including all onshore and offshore elements of the transmission network and the generation site in Morocco (referred to as the ‘Project’).

Acronyms

Acronym	Meaning
AIL	Abnormal Indivisible Load
BPM	Best Practicable Means
CBRA	Cable Burial Risk Assessment
CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department for Energy and Climate Change
DMP	Dust Management Plan
EA	Environment Agency
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
FLO	Fisheries Liaison Officer
FRAP	Flood Risk Activity Permit
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IAQM	Institute of Air Quality Management
ICNIRP	International Commission on Non-Ionising Radiation Protection
IEMA	Institute of Environmental Management and Assessment
LEMP	Landscape and Ecology Management Plan
MINNS	Marine Invasive Non-Native Species
MPCP	Marine Pollution Contingency Plan
On-CEMP	Onshore Construction Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PPE	Personal Protective Equipment
PPP	Pollution Prevention Plan
PRoW	Public Right of Way
SOPEP	Shipboard Oil Pollution Emergency Plan
SSSI	Site of Special Scientific Interest
SWMP	Site Waste Management Plan
VMP	Vessel Management Plan
WSI	Written Scheme of Investigation

Units

Units	Meaning
m	Metre
%	Percentage

1 DRAFT MITIGATION SCHEDULE

1.1 Introduction

1.1.1 This document forms Volume 1, Appendix 3.1: Draft Mitigation Schedule of the Preliminary Environmental Information Report (PEIR) prepared for the UK elements of the Xlinks Morocco-UK Power Project (referred to hereafter as 'the Proposed Development'). The PEIR presents the preliminary findings of the Environmental Impact Assessment (EIA) process for the Proposed Development.

1.1.2 This document details the draft list of mitigation measures that are being proposed within the PEIR. For the purposes of the EIA process, the term 'Measures adopted as part of the Proposed Development is used to include the following types of mitigation measures (adapted from IEMA, 2016).

- Primary (inherent) mitigation – measures included as part of the project design. IEMA describes these as '*modifications to the location or design of the development made during the pre-application phase that are an inherent part of the project and do not require additional action to be taken'*. This includes modifications arising through the iterative design process. These measures will be secured through the consent itself through the description of the project and the parameters secured in the Development Consent Order (DCO). For example, a reduction in footprint or height.
- Secondary (foreseeable) mitigation. IEMA describes these as '*actions that will require further activity in order to achieve the anticipated outcome'*. These include measures required to reduce the significance of environmental effects (such as lighting limits) and may be secured through an environmental management plan.
- Tertiary (inexorable) mitigation. IEMA describes these as '*actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects'*. It may be helpful to secure such measures through a Construction Environmental Management Plan (CEMP) or similar.

1.1.3 The draft mitigation measures have been informed via:

- consultation on the Scoping Report;
- feedback from non-statutory consultation;
- project design iteration and refinement (route planning and site selection); and
- industry best practice.

1.1.4 As with the PEIR, the draft mitigation schedule will inform pre-application consultation. It is anticipated that the number and nature of the mitigation measures will change, for example, between PEIR and DCO and then during the DCO Examination process. The Mitigation Schedule will, therefore, be updated to include new or amended measures in response to feedback where possible, in conjunction with the preparation of the Environmental Statement.

1.1.5 **Table 1.1** presents the draft mitigation schedule.

Table 1.1: Draft Mitigation Schedule

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Design of the Proposed Development including management measures during construction.	Primary	The following infrastructure, sensitive sites/features and recreational resources are proposed to be crossed by Horizontal Directional Drilling (HDD) (or other trenchless methodologies), as set out within the Onshore Crossing Schedule: • The Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI), the beach and the South West Coastal Path, situated along the coastline at the landfall, Cornborough Range. • The following watercourses/woodland: – Kenwith Stream, situated just south of Rickard's Down and approximately 300 m north of Abbotsham. – Littleham Wood, which includes a small watercourse, situated to the west of Robin Hill Farm and approximately 800 m to the north west of Littleham. – A small stream, 290 m south of Jennetts reservoir and to the west of West Ashridge, which feeds into Jennetts reservoir. – River Torridge, to the south of Bideford (to note, one HDD will cross the River Torridge, A386 and the Tarka Trail). • The following major roads: – A39, at a section approximately 250 m south west from the Abbotsham Cross roundabout and north west from High Park Farm. – A386, to the south of Bideford (as stated above, one HDD will cross both the River Torridge and A386). • A site of suspected archaeological assets at Winscott Barton. • There is an option to use HDD (or other trenchless techniques) to cross the unnamed watercourse and associated woodland to the immediate south of the Converter Site.	All	Proposed Development design to be provided and secured as a DCO requirement.
	Primary	The site selection and route refinement process for the Proposed Development has considered the locations of statutory and non-statutory designated sites, recreational resources and special category land. These areas have been avoided where possible through route selection and where this has not been possible, the design of the Proposed Development includes measures to minimise impacts through the use of trenchless construction techniques. For example, at the landfall and to cross the River Torridge.	All	
	Primary	The Onshore HVDC Cables and HVAC Cables would be completely buried underground for the entire length. Joint bays will be completely buried, with the land above reinstated. A maintenance cover will be provided on the surface for link boxes for access during the operation and maintenance phase.	All	
	Primary	All temporary working areas for the landfall, Onshore HVDC Cable Corridor, Converter Site, temporary compounds and the Alverdiscott Substation Connection Development will be clearly marked and secured with appropriate fencing.	Construction	
	Primary	Haul road(s) will be installed within the temporary working area of the Onshore HVDC Cable Corridor to minimise impacts during construction on agricultural land and reduce the number of construction vehicles on the local road network.	Construction	
	Primary	The Onshore HVDC Cables and HVAC Cables will be installed within the respective cable corridors in cable ducts, as opposed to using a direct lay installation method. This allows timely closure of trenches pending later installation (pulling-through) and jointing of cables.	Construction	
	Primary	The main construction compounds along the Onshore HVDC Cable Corridor would be situated in areas easily accessible from the A39, A386 and Manteo Way respectively. This would allow construction vehicles to be directed towards the relevant compounds whilst reducing movements along minor roads.	Construction	
	Primary	The design of the proposed Converter Site would include cut and fill earthworks to provide a suitable development platform for the converter stations whilst utilising the local topography to integrate the buildings in the landscape. Additional visual screening in the form of constructed earth bunds will further reduce the landscape and visual impact of the converter stations.	Construction, Operation and maintenance	
	Tertiary	Landscape planting will be provided at the converter stations site to assist with softening and screening the buildings. These measures will be set out in an Outline Landscape and Ecology Management Plan (LEMP) that will be prepared and submitted with the application for consent.	Construction and Operation and maintenance	An Outline LEMP will be shared and discussed with Torridge District Council and submitted with the DCO application. A detailed LEMP will be secured as a Requirement of the DCO.

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
	Primary	The design of the converter station buildings would include the following: • Architectural design of converter station buildings. • Use of appropriate materials/colours/finishes for the façades of the converter station buildings. The detailed design of the converter buildings would be developed in consultation with the relevant planning authorities.	Construction, Operation and maintenance	A Design Code will be submitted with application and detailed design secured as a Requirement of the DCO
	Primary	Following the completion of works, the haul road(s) will be removed and the ground reinstated to its previous use using stored subsoil and topsoil. All temporary construction compounds and temporary fencing will be removed, field drainage and/or irrigation will be reinstated and the land will be restored to its original condition. Where practicable, consideration will be given to early restoration of sections of the Onshore HVDC Cable Corridor.	Construction	Proposed Development design to be provided and approved as part of the DCO.
	Tertiary	An Outline Onshore Construction Environmental Management Plan (On-CEMP) will be prepared and submitted with the application for development consent. A final On-CEMP(s) will be developed in accordance with the Outline On-CEMP. The final On-CEMP(s) will incorporate measures to ensure that any potential environmental impacts would be minimised during construction.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Ecology	Primary	The design of the Proposed Development includes mitigation measures to avoid, minimise and compensate for impacts on ecology and nature conservation. The Proposed Development design has taken into account the hierarchy of mitigation actions, which include the following: • the avoidance of Important Ecological Receptors; • where complete avoidance is not possible, measures have been included to minimise and mitigate impacts (e.g. reduction in construction corridor width when crossing Devon hedgerows); • compensation for unavoidable impacts (e.g. full like-for-like replacement of hedgerows impacted by corridor); and compensation and enhancement, including Biodiversity Net Gain.	Construction, Operation and maintenance	Proposed Development design to be provided and approved as part of the DCO.
Ecology	Primary	The site selection process for the Proposed Development has considered the locations of statutory and non-statutory designated ecological sites, which have been directly avoided, where practicable. Where possible, unprotected areas of woodland, mature and protected trees (i.e. veteran trees), as well as other ecologically sensitive habitats have and will also be avoided.	All	
Ecology	Primary	Horizontal Directional Drilling (or other trenchless methodologies) would be utilised to allow the Onshore HVDC Cable Corridor to pass beneath the River Torridge, which is designated as a Local Nature Reserve (Kynoch's Foreshore) and County Wildlife Site at the crossing location. At this location, the HVDC Cables will pass beneath the river, its floodplain, the Tarka Trail and Lodge Plantation Unconfirmed Wildlife Site. Construction working areas associated with the River Torridge Crossing would be located outside of any designated areas.	All	
Ecology	Primary	Where practicable, the Onshore HVDC Cable Corridor has been reduced in width where the cables, haul road and site accesses are required to cross hedgerows, which are an important resource and potentially support wildlife such as dormice, bats and breeding birds. This would limit the width of hedge to be removed. Methods of clearance will be implemented to further minimise impacts on these groups, such as considering timings of clearance to avoid specific impacts.	Construction	
Ecology	Primary	In all instances where hedgerows are crossed by the Onshore HVDC Cable Corridor, the hedgerows will be reinstated on a 'like-for-like' basis, as soon as practicable. Where feasible, hedgerow bank materials will be stored and re-used to form the reinstated banks for hedgerows, including viable woody species stools. Hedgerow reinstatement will include replanting with suitable species mixes tailored to replicate and enhance the diversity of the existing hedgerows, using appropriate native species of local provenance. A suitably experienced hedging contractor familiar with creation of Devon hedgerows will be appointed to complete this work.	Construction	
Ecology	Primary	Agricultural habitats, such as improved and semi-improved grassland and arable land, would be reinstated after construction of the Onshore HVDC Cable Corridor. Topsoils and subsoils would be stored separately during construction for replacement in the correct sequence, and care would be taken with regard to levels of soil compaction.	Construction Operation and maintenance	
Ecology	Tertiary	An Outline Onshore Construction Environmental Management Plan (On-CEMP) will be prepared and submitted with the application for development consent. A final On-CEMP(s) will be developed in accordance with the Outline On-CEMP. The final On-CEMP(s) would include industry good practice measures to ensure dust suppression and prevention of contaminated water run-off from all construction areas. It would also set out any specific measures required during construction for the protection and mitigation of effects on retained habitats and features, protected or otherwise notable species and any other requirements such as species licensing, if required.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Ecology	Tertiary	A Landscape and Ecological Management Plan (LEMP) would be developed in accordance with the Outline LEMP. The Outline LEMP will be submitted as part of the application for the development consent and will include requirements and measures relating to ecology and nature conservation. It will include but not be limited to the following: • A series of pre-commencement ecological surveys, to understand conditions prior to construction (this provides an opportunity to address any changes prior to any works). • Requirements and management measures relating to ecology and nature conservation. • Methodologies required for removal and reinstatement of hedgerows or other habitats to be reinstated. • Methods required to prevent disturbance to or to comply with protected species licensing as relating to dormice (or any other species found to require licensing as a result of pre-commencement surveys). • Details and specifications for an Ecological Clerk of Works, including duties, responsibilities and reporting structure.	Construction, Operation and maintenance	An Outline LEMP will be shared and discussed with Torridge District Council and submitted with the application for development consent. A detailed LEMP will be secured as a Requirement of the DCO.
Ecology	Secondary	Where potential impacts are identified from the River Torridge trenchless crossing on nearby designated sites or other sensitive receptors (e.g. wintering birds), the construction work sites would be screened with appropriate fencing or screening to act as a visual and sound barrier.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Ecology	Tertiary	A suitably qualified Ecological Clerk of Works (ECoW) for the Proposed Development will be employed to ensure that construction activities comply with the Onshore CEMP.	Construction	Detailed requirements for ECoW to be set out in Outline On-CEMP/LEMP to be provided and approved as part of the DCO.
Ecology	Tertiary	A detailed Biosecurity Protocol will be developed as part of the final Onshore Construction Environmental Management Plan(s). The Biosecurity Protocol will contain measures to the limit spread and/or introduction of Invasive Non-Native Species during construction.	Construction	A detailed Biosecurity Protocol to be included as part of the final On-CEMP(s), which will be secured as a requirement of the DCO.
Ecology	Primary	Where hedgerow habitat removal is unavoidable, impacts would be reduced as far as possible by reducing the sizes of gaps in hedgerows or other features of value and, if possible, utilising existing gaps and gateways.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Ecology	Tertiary	In relation to dormice, details and methodologies for hedgerow removal will be included within the Outline Onshore CEMP to be submitted with the DCO. These measures will be followed in instances where the creation of gaps in hedgerows are necessary. These include but are not limited to: • clearance works would be carried out at times when the risk of injury to individual dormice are minimised, taking into account dormouse ecology and behaviour. This would mean that upstanding vegetation is cut and removed during the winter period when dormice are hibernating in nests at ground level, with grubbing out of roots and hedge banks undertaken from May to September, when dormice would be active and using the tree canopy. • construction areas would be carefully searched by a suitably licensed ecologist prior to clearance operations. If any dormice are encountered, they would be moved to suitable, safe locations beyond the working areas but within their existing range (in accordance with guidance in the Dormouse Conservation Handbook). • prior to the construction phase, habitat reinforcement, e.g., dormouse nest boxes, would be implemented beyond the areas of habitat removal. This would be applied in areas where any dormice displaced by the habitat clearance is likely to go. • Once the construction phase is completed, the reinstatement and enhancement of any dormouse habitat would be undertaken.	Construction	Detailed requirements set out in Outline On-CEMP/LEMP to be provided and approved as part of the DCO.
Ecology	Tertiary	A licence under Regulation 55 of the Conservation of Habitats and Species Regulations 2017 (as amended) would be required from Natural England prior to the commencement of construction. All construction works would be carried out in accordance with the Method Statement approved by Natural England as part of the licensing process. A draft licence application and Method Statement will be produced for the final ES.	Construction	Draft dormouse license application to be included with final application to be provided and approved as part of the DCO.

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Ecology	Primary	Where practicable, the cable route has avoided a habitat of significant value to otters. However, the route would pass through some areas of suitable habitat and cross several watercourses. Where the cable route crosses the River Torridge, HDD would reduce the potential impact as far as possible by passing under the river and associated terrestrial habitats. Construction work sites, including HDD and other tunnelling compounds, would be located a suitable distance away from areas of habitat of high potential value to otters to minimise disturbance levels.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Ecology	Tertiary	An updated survey will be undertaken for all minor watercourses affected by the proposed Onshore HVDC Cable Corridor prior to the commencement of works to ensure that no new holts or other places of rest for otters have been formed prior to the commencement of construction. If a new holt or place of rest is found, an appropriate mitigation strategy would be formulated in discussion with Natural England. If no suitable alternative to works would affect such a holt or place of rest, a Natural England development licence for otters would be required before works can commence.	Construction	Licensing not currently identified as necessary, but to be reviewed and sought if required due to changes in baseline as a result of further surveys prior to commencement of construction. Details of decision path for need of licensing to be set out in the Outline LEMP to be provided and approved as part of the DCO
Ecology	Tertiary	In order to minimise potential disturbance to otters, compounds within 15 m of watercourses will be screened with solid fencing on sides adjacent to the watercourse, and a review of any working lighting will be undertaken to ensure that light spill does not fall onto currently unlit sections of watercourse during the construction period.	Construction	Detailed requirements set out in Outline On-CEMP/LEMP to be provided and approved as part of the DCO. A final On-CEMP(s) and LEMP will be secured as a Requirement of the DCO.
Ecology	Secondary	On the basis of the survey findings, no mitigation for water voles is required. An updated survey for water vole would be undertaken prior to construction. If water voles are identified in watercourses affected by the construction works, measures for their protection would be agreed upon with Natural England.	Construction	
Ecology	Secondary	For hedgerows known to be used by high numbers of bats or rarer species, temporary structures would be used to replicate the linear feature's canopy, where hedgerows have been removed leaving gaps of greater than 10m, and left in place overnight during the construction activity. This structure would be placed within the gap and left overnight. These would be formed of suitable materials such as 'Heras' fencing panels adorned with camouflage netting and stoutly anchored to the ground. Contractors would be made aware of the importance of carrying out this task, through briefing at site inductions and toolbox talks. It would not be necessary to undertake this measure during the winter period (November to February inclusive) when bats are inactive.	Construction	
Ecology	Tertiary	Although no active badger setts have so far been identified, activity along the Onshore HVDC Cable Corridor would be subject to continued monitoring on a four monthly basis for a full year immediately prior to commencement of construction, to review whether badgers have excavated and commenced to inhabit any new setts in locations which might be affected by the proposed Onshore HVDC Cable Corridor or converter station construction works.	Construction	
Ecology	Secondary	In the event that newly-occupied setts were identified in locations where they would be damaged or disturbed by the construction works, a license would be applied for under the Protection of Badgers Act 1992. This would require an appropriate mitigation package to include sufficient details to understand if the sett to be affected a main sett, annexe, subsidiary or outlier and whether an artificial sett within the existing territory of the badger social group would be required. Methods to create this, if required, along with methods of exclusion of badgers from the sett and measures to permanently or temporarily close the sett, would be required.	Construction	Licensing not currently identified as necessary, but to be reviewed and sought if required due to changes in baseline as a result of further surveys prior to commencement of construction. Details of decision path for need of licensing to be set out in the Outline LEMP to be provided and approved as part of the DCO.
Ecology	Tertiary	Clearance of habitats identified as being of potential value to birds for nesting would be undertaken outside of the bird nesting season, where possible. This would include hedgerow and scrub habitats, grassland or other habitats suitable for ground nesting bird species. Should some clearance be required outside this period, the relevant areas would be inspected by an Ecological Clerk of Works to check for the presence of nesting birds prior to any site clearance. In the event nests were found, works would avoid the area of the nest until all nestling birds have fledged. Following removal and works, habitat reinstatement would be carried out to renewed opportunities for bird nesting, once re-established.	Construction	Detailed requirements set out in Outline On-CEMP/LEMP to be provided and approved as part of the DCO. A final On-CEMP(s) and LEMP will be

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Ecology	Secondary	Measures to prevent disturbance to birds would be put in place at construction compounds where construction activity could impact habitats likely to support nesting or roosting birds. This would include the erection of temporary visual/sound barriers around work sites associated with the HDD on both sides of the estuary. Where works on the Onshore HVDC Cable Corridor outside of the HDD work sites lie within 100 m of any habitats likely to be used by wintering birds, works would be timed to avoid the period when they are present (November to February inclusive).	Construction	secured as a Requirement of the DCO.
Ecology	Tertiary	Areas of high potential value to reptiles, which could be affected by construction works, would be subject to phased habitat degradation in order to encourage reptiles to evacuate the construction areas prior to the commencement of works. Immediately prior to clearance of remaining vegetation and earthworks, an update survey would be required to ensure that any present reptiles are temporarily removed to good (not degraded) habitat either side of the works, where they would remain until construction is complete with habitat reinstatement. Details and methodologies will be included within the Outline On-CEMP, which will be submitted with the application for development consent.	Construction	
Ecology	Secondary	Where roosts are identified in locations which would require their destruction, damage, or where effective prevention of disturbance could not be ensured, licensing under Regulation 55 of the Conservation of Habitats and Species Regulations 2017 (as amended) would be required from Natural England. However, based on the current understanding of the Proposed Development, it is not likely to be required.	Construction	Licensing not currently identified as necessary, but to be reviewed and sought if required due to changes in baseline as a result of further surveys prior to commencement of construction. Details of decision path for need of licensing to be set out in the Outline LEMP to be provided and approved as part of the DCO.
Ecology	Tertiary	A single tree with a roost used by small numbers of soprano pipistrelles has been identified adjacent to the HDD work site situated to the south west of the Torridge Estuary. Measures to reduce disturbance to this roost will be included within the Outline Onshore CEMP to be submitted with the application for development consent. Measures would include but not be limited to: • fencing around the HDD work site to control lighting and disturbance. • directional lighting to avoid light spillage. • Artificial bat roosting facilities would be provided in alternative trees (i.e. five bat boxes are proposed to provide alternative roosting possibilities close to the existing roost, based upon survey observation, and within the flight route of bats using the affected roost). This approach would be taken for any other roosts identified in previously un-surveyed locations or during pre-commencement surveys.	Construction	Detailed requirements set out in Outline On-CEMP/LEMP to be provided and approved as part of the DCO. A final CEMP(s) and LEMP will be secured as a Requirement of the DCO.
Ecology	Tertiary	Measures to ensure that construction works are carried out in a tidy fashion, with good standards of handling potentially harmful materials, would prevent access by badgers to these materials. Similarly, ensuring that open excavations are left with suitable plank 'escape routes' or alternatively covered where necessary would also prevent badgers from becoming trapped in deep excavations. These measures would be set out in the Outline Onshore CEMP and Outline LEMP.	Construction	
Ecology	Primary - Enhancement	The Proposed Development will include a detailed landscape design scheme, which will be provided within the Outline Landscape and Ecology Management Plan. Habitats to be created include species-rich grasslands, shrub and scrub, woodland and woodland edge habitat intended to assist with creation of wet woodland on a landscape scale which could assist in recreating areas of wet Atlantic woodland. This will incorporate enhancements to an existing small water-course. Additional hedgerow will be created to form rational field boundaries and provide increased connectivity into the existing hedgerow network which exists in the area.	Construction Operation and Maintenance	Outline LEMP to be provided as part of application for development consent.
Ecology	Primary - Enhancement	The Proposed Development will commit to providing at least 10% net gain, measured using the Statutory Biodiversity Metric.	Operation and Maintenance	To be secured as part of the DCO.
Historic Environment	Primary	The design of the onshore elements of the Proposed Development, including temporary land required for construction, would consider the minimisation of land take and avoid, where possible, impacts on known buried archaeological sites and features.	Construction	Proposed Development design to be provided and secured as a DCO requirement.
Historic Environment	Primary	The onshore elements of the Proposed Development, including temporary land required for construction, will be designed to avoid direct physical impacts on designated heritage assets.	Construction	

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Historic Environment	Tertiary	An Outline Landscape and Ecology Management Plan (LEMP) will be prepared and submitted with the application for development consent. A Landscape and Ecology Management Plan will be developed in accordance with the Outline LEMP. The LEMP will include details of mitigation planting at the Converter Site, including the number, location, species and details of management and maintenance of planting. Where practical, landscape mitigation planting will be established as early as reasonably practicable in the construction phase.	Construction	Outline LEMP to be provided as part of application for development consent.
Historic Environment	Tertiary	An Outline Written Scheme of Investigation (WSI) will be prepared and submitted with the application for development consent. A WSI for Onshore Archaeology will be developed in line with an Outline WSI for Onshore Archaeology. The onshore WSI will detail the survey and archaeological mitigation requirements in advance of and during construction.	Construction	These measures would be secured as a requirement of the DCO.
Historic Environment	Secondary	The ongoing programmes of geophysical survey and archaeological trial trenching would be completed, where practicable and where legal access is available.	Construction	Undertaken ahead of DCO submission, with results used in the assessment presented within the ES.
Historic Environment	Tertiary	An Outline Onshore Construction Environmental Management Plan (On-CEMP) will be prepared and submitted with the application for development consent. An On-CEMP(s) will be developed in accordance with the Outline On-CEMP. The On-CEMP(s) will include measures to reduce temporary disturbance to heritage assets during construction.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Hydrology and Flood Risk	Primary	Horizontal Directional Drilling (HDD) (or other trenchless methodology) is to be used to cross Kenwith Stream, River Torridge and Jennets Reservoir Tributary. HDD (or other trenchless methodology) is also to be used to cross the shingle bar at Cornborough Range.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Hydrology and Flood Risk	Primary	HDD (or other trenchless methodology) entry and exit points will be located at least 8 m away from ordinary watercourses, 8 m from EA Main Rivers (non-tidal) and 16 m from EA Main Rivers (tidal) and the landward toe of formal and informal flood defences. Where a surface watercourse (ordinary watercourses and EA Main Rivers) is to be crossed by HDD (or other trenchless methodology), the Onshore HVDC and HVAC Cable Corridor will be installed at least 1.5 m beneath the hard bed of any watercourses. Depths of construction to be confirmed via site investigations during detailed design and to be confirmed with the EA and LLFA. Where EA flood defences are present, a minimum 1.5 m vertical clearance will be maintained between the hard bed of the watercourse and the landward toe of those flood defences, and to be confirmed with EA and LLFA.	Construction	
Hydrology and Flood Risk	Primary	The following easements will be maintained between watercourses and all temporary working areas for the Onshore HVDC and HVAC Cable Corridors, temporary construction compounds and the converter stations. • 8 m away from the banks of ordinary watercourses, • 8 m from EA Main Rivers and the landward toe of associated formal and informal flood defences (non-tidal) and • 16 m from tidal EA Main Rivers and the landward toe of associated formal and informal flood defences. The same buffer will be maintained for the permanent converter stations.	Construction	
Hydrology and Flood Risk	Secondary	Fences, walls, ditches and drainage outfalls will be retained at the landfall and along the Onshore HVDC and HVAC Cable Corridor, where reasonably practicable. Where it is not reasonably practicable to retain them, any damage will be repaired and reinstated as soon as reasonably practical. The Environment Agency must be notified if damage occurs to any Environment Agency main river or related flood infrastructure.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Hydrology and Flood Risk	Tertiary	An Outline Onshore Construction Environmental Management Plan (On-CEMP) will be prepared and submitted with the application for development consent. A final On-CEMP will be developed in accordance with the Outline On-CEMP. The final On-CEMP would include industry good practice measures to ensure prevention of contaminated water run-off from all construction areas.	Construction	
Hydrology and Flood Risk	Tertiary	An Outline Pollution Prevention Plan (PPP) will be prepared and submitted with the application for development consent. A PPP will be developed in accordance with the Outline PPP and will include details of emergency spill procedures. Good practice guidance detailed in the EA's Pollution Prevention Guidance notes (including Pollution Prevention Guidance notes 01, 05, 08 and 21) will be followed where appropriate, or the latest relevant available guidance.	Construction	Requirement for PPP to be set out in the Outline On-CEMP. Outline On-CEMP to be secured as a DCO requirement.

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Hydrology and Flood Risk	Tertiary	An Outline DMP will be incorporated within the On-CEMP(s) in line with the Guidance on the assessment of dust from demolition and construction (IAQM, 2023). A DMP assists in the appropriate management techniques to limit dust soiling from construction and decommissioning activities. An outline DMP would be provided as part of the Outline On-CEMP.	Construction	Requirement for DMP to be set out in the Outline On-CEMP. Outline On-CEMP to be secured as a DCO requirement.
Hydrology and Flood Risk	Tertiary	The Construction Drainage Strategy will incorporate pollution prevention and flood response measures to ensure that the potential for any temporary effects on water quality or flood risk are reduced as far as practicable during the construction stage. Such measures would be implemented through the On-CEMP(s) and associated Construction Method Statements, including but not limited to the following: • installation of suitable facilities to remove material (e.g., mud and dust) from wheels; • use of sediment fences along existing watercourses/waterbodies when working nearby to reduce sediment load; • covers for lorries transporting materials to/from site to prevent releases of dust/sediment to watercourses/drains; • bulk storage areas to be secured and provided with secondary containment (in accordance with the Oil Storage Regulations and best practice); • storage of oils and chemicals away from existing watercourses, including drainage ditches or ponds; • concrete to be stored and handled appropriately to prevent release to drains; • treatment of any runoff water that gathers in the trenches would be pumped via settling tanks or ponds to remove any sediment; • obtain consent for any works (e.g., discharge of surface water) that may affect an existing watercourse. The conditions of the consent will be specified to ensure that construction does not result in significant alteration to the hydrological regime or an increase in fluvial risk; • use of a documented spill procedure and use of spill kits kept in the vicinity of chemical/oil storage; • storage of stockpiled materials on an impermeable surface to prevent leaching of contaminants and use of covers when not in use to prevent materials being dispersed and to protect from rain; and • stockpiles to be kept to minimum possible size with gaps to allow surface water runoff to pass through.	Construction	
Hydrology and Flood Risk	Tertiary	An Operational Drainage Strategy is to include measures to ensure that existing land drainage is reinstated and/or maintained. This will include measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates at the Converter Site. The Operational Drainage Scheme will be developed in line with the latest relevant drainage guidance notes in consultation.	Construction, Operation and maintenance	To to be secured as a DCO requirement.
Hydrology and Flood Risk	Tertiary	The provisions of the Flood Risk Activity Permits (FRAPs) and Land Drainage Consents will be disapplied and incorporated as protected provisions of the consent order. The design of the watercourse crossings will be agreed with the Environment Agency and/or Devon County Council	Construction	To be secured as protective provisions as a requirement of the DCO.
Hydrology and Flood Risk	Tertiary	Consents/permits relating to dewatering activities that may affect surface water and / or groundwater are to be obtained as and when required during the construction phase of the Project. The conditions of the consent will be specified to ensure that construction does not result in significant alteration to the hydrological regime or an increase in fluvial risk.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Hydrology and Flood Risk	Tertiary	An Outline Onshore Decommissioning Strategy would be developed in a timely manner in consultation with the relevant stakeholders and prior to commencement of construction. The Onshore Decommissioning Plan(s) would be developed in accordance with the Outline Onshore Decommissioning Strategy prior to decommissioning. and in line with the latest available guidance. The Onshore Decommissioning Plan will include provisions for the removal of onshore above ground infrastructure and the decommissioning of below ground infrastructure and details relevant to flood risk, pollution prevention and avoidance of ground disturbance.	Decommissioning	To be secured as protective provisions as a requirement of the DCO.
Hydrology and Flood Risk	Tertiary	An Outline Flood Management Plan will be prepared for works taking place within a Flood Warning/Flood Alert area. During the construction phase the Principal Contractor will sign up to the Flood Warning Service and will be alerted by a phone call or text when a Flood Warning becomes active to enable site personnel to be evacuated from the site in a timely manner prior to a flood event occurring.	Construction	

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Hydrology and Flood Risk	Tertiary	In order to manage impacts to field drainage, the Outline On-CEMP will stipulate that the contractor will develop field drainage plans in consultation with the relevant landowners. If required, additional field drainage will be installed to ensure the existing drainage of the land is maintained during and after construction.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Hydrology and Flood Risk	Tertiary	An Outline Bentonite Breakout Plan will be prepared as part of the Outline On-CEMP.	Construction	
Hydrology and Flood Risk	Tertiary	Where required, trenched techniques may be used for minor ditches or smaller watercourses that are frequently dry. In these cases, measures will be implemented to protect water quality and flow and these will be detailed within the Outline On-CEMP.	Construction	
Hydrology and Flood Risk	Tertiary	During construction of piled foundations, mitigation measures as defined in the following guidance will be used: Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (EA, 2001), or latest relevant available guidance.	Construction	
Ground Conditions	Tertiary	The Outline On-CEMP will be submitted as part of the application for the development consent. On-CEMP(s) will be developed in accordance with the Outline On-CEMP. The Outline On-CEMP will provide details of appropriate studies (e.g., site investigations) proposed to be undertaken where major HDDs (or other trenchless methodologies) are proposed, during the detailed design stage to confirm ground conditions. This includes on the northern and southern banks of the River Torridge where subsequent slope stability assessments will be undertaken as necessary.	Construction	Proposed Development design to be provided and secured as a DCO requirement.
Ground Conditions	Tertiary	An Outline On-CEMP will be developed that will manage environmental risks through the duration of the construction phase. It will include the following: • Storage of stockpiled materials on an impermeable surface to prevent leaching of contaminants and use of covers when not in use to prevent materials being dispersed and to protect from rain; • The implementation of dust suppression measures during construction to minimise nuisance dust emissions during the works; • A construction and then operational drainage strategy would be implemented to minimise surface water runoff and pollution; • Bulk storage areas to be secured and provided with secondary containment (in accordance with the Oil Storage Regulations and best practice); • Storage of oils and chemicals away from existing watercourses, including drainage ditches or ponds; • Use of a documented spill procedure and use of spill kits kept in the vicinity of chemical/oil storage; • The disposal of solid waste, including surplus spoil, would be managed to maximise the environmental and developmental benefits from the use of surplus material and to minimise any adverse effects of disposal. In general, the principles of the waste management hierarchy, reduce-reuse-recycle would be applied; • Potential waste arising from excavation would be sampled and analysed to determine the waste classification required to establish relevant waste streams, suitability for reuse/recycle and disposal/storage requirements; • The Outline Onshore CEMP will provide details of the broad types of waste produced during construction and will include good practice measures for managing waste generated during construction. All waste generated would be disposed of by a suitably licensed waste contractor; and • The implementation of suitable measures in line with the Construction Design Management Regulations (2015) would manage any risks posed to human health. These measures should include the provision of suitable Personal Protective Equipment (PPE) and welfare facilities. Other measures to manage risks to human health from the presence of asbestos should be implemented and should include dust suppression measures and air monitoring.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Ground Conditions	Tertiary	An Outline Onshore Pollution Prevention Plan (PPP) will form part of the Outline Onshore CEMP, which will be prepared and submitted with the application for development consent. Onshore PPP(s) will be developed in accordance with the Outline Onshore PPP and will include details of emergency spill procedures. Good practice guidance detailed in the Environment Agency's Pollution Prevention	Construction	

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		Guidance notes (including Pollution Prevention Guidance notes 01, 05, 08 and 21) will be followed where appropriate, or the latest relevant available guidance.		
Ground Conditions	Tertiary	A Discovery Strategy will be prepared to detail the procedure should any previously unknown contamination be discovered. The discovery strategy would comprise a watching brief that would be undertaken by suitably trained personnel during construction activities such as ground clearance and earthworks.	Construction	
Ground Conditions	Secondary	The design aims for excavated materials (soils and rocks) generated by the Proposed Development to be reused, where practicable. The reuse of these materials would require demonstration that they are both environmentally and geotechnically suitable.	Construction	To be secured as part of the DCO.
Ground Conditions	Tertiary	Appropriate Personal Protective Equipment will be used and relevant good working practices applied to avoid potential risk to human health including from any potential ground contamination, in line with relevant available guidance.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Ground Conditions	Tertiary	An Outline Onshore Decommissioning Strategy would be developed in a timely manner in consultation with the relevant stakeholders and prior to commencement of construction. The Onshore Decommissioning Plan(s) would be developed in accordance with the Outline Onshore Decommissioning Strategy prior to decommissioning. and in line with the latest available guidance. The Onshore Decommissioning Plan will include provisions for the removal of onshore above ground infrastructure and the decommissioning of below ground infrastructure and details relevant to flood risk, pollution prevention and avoidance of ground disturbance.	Decommissioning	To be secured as a requirement of the DCO.
Ground Conditions	Tertiary	All construction personnel conducting intrusive works, in any part of the site, would attend a toolbox talk regarding explosives safety & awareness. This should comprise part of the standard site induction briefing and would form a component of the Health and Safety Plan for the site adhering to the requirements of CDM regulations 2015. All personnel working on site would be briefed on UXO recognition and made aware of the possible risks. They would be informed of the actions to take to alert the site manager and to keep people and equipment away from the hazard.	Construction	Implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement.
Noise and Vibration	Tertiary	An Outline Construction Traffic Management Plan (CTMP) will be prepared and submitted with the application for development consent. CTMP(s) will be developed in accordance with the Outline CTMP prior to construction.	Construction	Outline CTMP to be provided as part of application for development consent. CTMP to be developed in line with Outline CTMP and agreed with relevant stakeholders. CTMP to be secured as DCO requirement.
Noise and Vibration	Tertiary	Best Practicable Means (as defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990) will be implemented during the construction, operation, maintenance aspects of the Proposed Development to ensure that noise levels are minimised within all reasonably foreseeable circumstances. For the construction phase these will be detailed within the Outline On-CEMP.	All Operation and Maintenance	Management of construction noise implemented through the On-CEMP(s). On-CEMP(s) to be secured as DCO requirement. Proposed Development design to be provided and approved as part of the DCO inclusive of operational noise criteria.
Noise and Vibration	Tertiary	Onshore Construction Environmental Management Plan(s) (On-CEMP(s)). The On-CEMP(s) will include construction noise and vibration limits and BPM to mitigate noise and vibration from construction activities associated with the Proposed Development.	Construction	Requirement to be set out in the On-CEMP(s). On-CEMP(s) to be secured as a DCO requirement.
Noise and Vibration	Primary	The following noise control measures will be considered in the design of the converter stations. • The orientation and layout of the converter stations will be considered in order to minimise noise levels at nearby receptors. • Quieter equipment will be selected, where available and practicable and mitigation measures such as acoustic barriers and enclosures will be specified where necessary.	Operation and Maintenance	Operational noise limits to be derived which will inform the design principles for the converter stations.
Noise and Vibration	Tertiary	An Outline Onshore Decommissioning Strategy would be developed in a timely manner in consultation with the relevant stakeholders and prior to commencement of construction. The Onshore Decommissioning Plan(s) would be developed in accordance with the Outline Onshore Decommissioning Strategy prior to decommissioning. and in line with the latest available guidance.	Decommissioning	To be secured as a requirement of the DCO.

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Air Quality	Tertiary	Dust mitigation measures that are highly recommended by the IAQM for sites with high dust risk (IAQM, 2024). These will be implemented for construction activities on site.	Construction	Dust control measures to be secured through Dust Management Plan (DMP), as an annex to the On-CEMP(s) which will be secured via a DCO requirement.
Air Quality	Tertiary	**Communications** • Develop and implement a stakeholder communications plan that includes community engagement before work commences on site. • Display the name and contact details of person(s) accountable for air quality and dust issues on the Proposed Development Draft Order Limits. This may be the environment manager/engineer or the site manager. • Display the head or regional office contact information	Construction	
Air Quality	Tertiary	**Dust Management Plan** • Develop and implement a Dust Management Plan (DMP) (which may include measures to control other emissions). The level of detail will depend on the risk and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. The DMP may include monitoring of dust.	Construction	
Air Quality	Tertiary	**Site Management** • Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Make the complaints log available to the local authority when asked. • Record any exceptional incidents that cause dust and/or air emissions, either on- or off- site, and the action taken to resolve the situation in the log book. • Hold regular liaison meetings with other high risk construction sites within 500 m of the Proposed Development Draft Order Limits, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes.	Construction	
Air Quality	Tertiary	**Monitoring** • Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of the Proposed Development Draft Order Limits. Cleaning requirements will be discussed and agreed with relevant stakeholders where deemed appropriate. • Carry out regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of Proposed Development Draft Order Limits. • Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions. • Where deemed reasonably necessary in consultation with the relevant local planning authority, dust deposition, dust flux or real-time PM10 continuous monitoring locations will be agreed. Commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. A shorter monitoring period or concurrent upwind and downwind monitoring may be agreed by the relevant local planning authority. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction (IAQM, 2012).	Construction	
Air Quality	Tertiary	**Preparing and Maintaining the Site** • Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. Use screening intelligently where possible – e.g., locating site offices between potentially dusty activities and the receptors. • Where deemed reasonably required, erect solid screens or barriers around the site boundary. • Where reasonably practicable, fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extended period. • Avoid site runoff of water or mud. • Keep site fencing, barriers and scaffolding clean.	Construction	

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		• Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site, ensure they are appropriately covered. • Depending on the duration that stockpiles will be present and their size - cover, seed, fence or water to prevent wind whipping.		
Air Quality	Tertiary	**Operating Vehicle/machinery and Sustainable Travel** • Ensure all vehicles switch off engines when stationary – no idling vehicles. • Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable. • Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate) • Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials. • Implement a Construction Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).	Construction	
Air Quality	Tertiary	**Operations** • Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g., suitable local exhaust ventilation systems. • Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible. • Use enclosed chutes, conveyors and covered skips, where practicable. • Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate. • Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	Construction	
Air Quality	Tertiary	**Waste Management** • Avoid bonfires and burning of waste materials.	Construction	
Air Quality	Tertiary	**Medium Risk Measures Specific to Construction** • Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	Construction	
Air Quality	Tertiary	**High Risk Measures Specific to Trackout** • Avoid dry sweeping of large areas. • Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. • Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as practicable. • Record all inspections of haul routes and any subsequent action in a site log book. • Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned. • Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site). • Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. • Access gates to be located at least 10 m from receptors where possible	Construction	

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Air Quality	Tertiary	An Outline Dust Management Plan (DMP) will be submitted with the application sitting within the Outline Onshore CEMP. Best practice measures, as outlined in IAQM guidance (IAQM, 2024) will be included.	Construction	
Air Quality	Tertiary	An Outline Construction Traffic Management Plan (CTMP) will be prepared and submitted with the DCO application. CTMP(s) will be developed in accordance with the Outline CTMP prior to construction.	Construction	An Outline CTMP will be developed and submitted with the DCO application. The detailed CTMP will be secured as a Requirement of the DCO.
Air Quality	Tertiary	An Outline Onshore Decommissioning Strategy would be developed in a timely manner in consultation with the relevant stakeholders and prior to commencement of construction. The Onshore Decommissioning Plan(s) would be developed in accordance with the Outline Onshore Decommissioning Strategy prior to decommissioning.	Decommissioning	To be a requirement of the DCO.
Land Use	Tertiary	The preparation of an Outline Soil Management Plan which would form part of the Outline Onshore CEMP. Measures to be adopted as part of the plan would include: • Separate stripping and storage of identified topsoil and subsoil resources to prevent mixing of soil materials which can reduce overall soil quality. • Location of topsoil and subsoil heaps to avoid cross-contamination of materials and the trafficking of soil heaps by construction traffic. • Maintenance of topsoil and subsoil heaps to reduce potential losses of soil materials throughout the duration of storage. • Control of the timing of soil handling operations to reduce potential soil damage through handling in unsuitable conditions. • Choice of soil handling machinery and method for its use, to reduce potential for soil compaction and soil damage. • Implementation of appropriate soil aftercare following reinstatement of land in accordance with the Outline Soil Management Plan. • Careful supervision of soil handling operations on site to ensure that recognised good practice is effectively implemented on site.	Construction	The Outline Soil Management Plan will be submitted with the application and a detailed Soil Management Plan would secured as a Requirement of the DCO.
Land Use	Tertiary	Farm Holdings: The application of measures to maintain the operation of the farm holdings, including: • The maintenance and reinstatement, where reasonably practicable, of existing water supplies and drainage systems during the construction process. • The maintenance of access routes across individual fields, where reasonably practicable, where these are severed during construction. • The maintenance of farm access routes, wherever reasonably practicable, between fields within a farm holding • Appropriate fencing of the Proposed Onshore Development Area, dependent upon the nature of the individual farm holding affected. • Appropriate construction practices to be implemented to ensure that the potential risk for the spread of animal and plant diseases is reduced as far as practicable. • Timing of construction works, where feasible, to minimise disruption to landowners/farming practice, through agreement with landowners	Construction	Outline On-CEMP submitted with application and final On-CEMP(s) will be secured as a requirement of the DCO.
Land Use	Tertiary	The preparation of an Outline PRoW Management Plan to include measures to manage impacts to the PRoW network affected during construction.	Construction	An Outline PRoW Management Plan submitted with the application and detailed PRoW Management Plan will be secured as a requirement of the DCO.
Land Use	Tertiary	Recreational Assets: The preparation of the Outline On-CEMP to include measures to limit the effects of the Proposed Development on recreational assets, wherever possible. These would include measures to control potential environment impacts including: • Construction Dust • Construction Noise and vibration • Construction traffic; and • Surface water and drainage management	Construction	Outline On-CEMP submitted with application and detailed On-CEMP(s) will be secured as a requirement of the DCO.

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Socio-economics & tourism	Tertiary	An Outline Onshore Construction Environmental Management Plan (On-CEMP) will be prepared and submitted with the application for development consent. An On-CEMP(s) will be developed in accordance with the Outline On-CEMP. The On-CEMP(s) would ensure the construction phase is managed in accordance with standard industry practice and would include measures relating to set construction working hours, management of waste and materials storage, and drainage procedures.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Socio-economics & tourism	Tertiary	An Outline Construction Traffic Management Plan (CTMP) will be prepared and submitted with the application for development consent. CTMP(s) will be developed in accordance with the outline CTMP prior to construction. The CTMP(s) would include measures to reduce disruption and traffic.	Construction	
Socio-economics & tourism	Tertiary	The Applicant will engage with the local community to allow for measures to be developed to ensure that disruption is minimised and that where possible, benefits to the local community are secured.	Construction Operation and Maintenance	
Socio-economics & tourism	Tertiary	The Applicant will engage with local companies and stakeholders to help develop a strategy to deliver economic benefits, such as skills development.	Construction Operation and Maintenance	
Socio-economics & tourism	Primary	The design of the proposed Converter Site would include cut and fill earthworks to provide a suitable development platform for the converter stations whilst utilising the local topography to integrate the buildings in the landscape. Additional visual screening in the form of constructed earth bunds will further reduce the landscape and visual impact of the converter stations.	Construction Operation and Maintenance	
Human Health	Primary	Compliance with exposure standards set out in Department for Energy and Climate Change (DECC) Voluntary Code of Practice (Department for Energy Security & Net Zero, 2012) including compliance with the International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines (ICNIRP, 1998).	Construction	In relation to construction: through the Outline On-CEMP at ES stage. In relation to operation: through DCO requirement secured through appropriate management plan.
Climate Change	Primary	The design of the Proposed Development includes the sensitive routeing and siting of infrastructure to avoid disturbance to land that contains high carbon stocks (e.g. woodland, peat, etc.).	Construction	Proposed Development design to be provided and approved as part of the DCO.
Climate Change	Primary	The area of Littleham Wood will be crossed by Horizontal Directional Drilling (or other trenchless methodologies) to avoid disturbance to the woodland and associated carbon stocks.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Climate Change	Primary	The converter stations will be designed to ensure resilience to the potential impacts of future climate change, including the following: • Converter buildings and associated electrical equipment should be designed with durable materials in line with durability quality standards and guidance. • The converter stations will house auxiliary equipment e.g. appropriate cooling plant to account for a range of temperature conditions, as consistently heightened temperatures could lead to efficiency losses due to overheating, or the failure of electrical equipment.	Operation and Maintenance	Resilience Plan to be secured as DCO requirement.
Climate Change	Secondary	The Applicant will explore opportunities to reduce construction related emissions, including the following mitigation measures: • explore the use of materials with a lower embodied carbon and higher recycled content. • identification of opportunities to reduce emissions via the supply chain; and • explore the use of low carbon construction techniques (including lower carbon fuel) and energy efficient machinery/vehicles.	Construction	Resources Management Plan (RMP) To be secured as DCO requirement.
Climate Change	Tertiary	The Outline Onshore Construction Environmental Management Plan(s) (CEMP) will set out measures to reduce Greenhouse Gas emissions associated with the construction of the Proposed Development, which would comprise the following mitigation measures: • Where practicable, pre-fabricated elements would be delivered to the site ready for assembly, which will reduce on-site construction waste and reduce vehicle movements as part of the construction process. • Vehicles used in road deliveries of materials, equipment and waste arisings on- and off-site would be loaded to full capacity, wherever practicable, to minimise the number of journeys associated with the transport of these items.	Construction	Within the Outline On-CEMP to be provided as part of application for development consent. On-CEMP(s) to be secured as DCO requirement.

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		• All machinery and plant would be procured to adhere with relevant good practice emissions standards at the time of procurement, where feasible and should be maintained in good repair to remain fuel efficient. • When not in use, vehicles and plant machinery involved in site operations would be switched off to further reduce fuel consumption. • The volume of waste generated would be minimised, and resource efficiency maximised, by applying the principles of the waste hierarchy throughout the construction period. Segregated waste storage should be employed to maximise recycling potential for materials. • Equipment and machinery requiring electricity would only be switched on when required for use. Procedures would be implemented to ensure that staff adhere to good energy management practices, e.g. through turning off lights, computers and heating/air conditioning units when leaving buildings. • Where practicable, temporary construction haul roads would be developed utilising recycled aggregates to minimise embodied carbon impacts.		
Climate Change	Tertiary	The Offshore Construction Environmental Management Plan(s) will include a Site Waste Management Plan, Marine Pollution Contingency Plan, and a Shipboard Oil Pollution Emergency Plan	Construction	Within the Outline Offshore CEMP to be provided as part of application for development consent. The Offshore CEMP will be secured as DCO requirement.
Climate Change	Tertiary	An Outline Site Waste Management Plan (SWMP) will be developed and submitted with the development consent order. It will incorporate the appropriate measures to manage waste produced by the Proposed Development and re-use materials, where practicable.	Construction	The Site Waste Management Plan would be appended to the Outline On-CEMP to be provided as part of application for development consent. On-CEMP(s) to be secured as DCO requirement.
Climate Change	Tertiary	The Construction Traffic Management Plan (CTMP) will set out measures to reduce construction traffic movements and journey mileage to and from the Proposed Development site.	Construction	An Outline CTMP will be developed and submitted with the DCO application. The detailed CTMP will be secured as a Requirement of the DCO.
Climate Change	Tertiary	An Outline Onshore Decommissioning Strategy would be developed in a timely manner in consultation with the relevant stakeholders and prior to commencement of construction. The Onshore Decommissioning Plan(s) would be developed in accordance with the Outline Onshore Decommissioning Strategy prior to decommissioning. The Onshore Decommissioning Plan(s) will include provisions for the removal of all onshore above ground infrastructure and the decommissioning of below ground infrastructure (if and where relevant and practicable), and details relevant to flood risk, pollution prevention and avoidance of ground disturbance. The Onshore Decommissioning Plan(s) will be in line with the latest relevant available guidance.	Decommissioning	Secured as a requirement of the DCO.
LSVIA	Primary	Where practicable, the final design and routeing of the Proposed Development would avoid mature trees and minimise the loss of mature Devon Hedgebanks.	Construction	An Outline LEMP will be shared and discussed with Torridge District Council and submitted with the application for development consent. A detailed LEMP will be secured as a Requirement of the DCO.
LSVIA	Primary	In all instances where hedgerows are crossed by the Onshore HVDC Cable Corridor, the hedgerows will be reinstated on a 'like-for-like' basis, as soon as practicable. Where feasible, hedgerow bank materials will be stored and re-used to form the reinstated banks for hedgerows, including viable woody species stools. Hedgerow reinstatement will include replanting with suitable species mixes tailored to replicate and enhance the diversity of the existing hedgerows, using appropriate native species of local provenance. A suitably experienced hedging contractor familiar with creation of Devon hedgerows will be appointed to complete this work.	Construction Operation and Maintenance	
LSVIA	Primary	The Onshore HVDC Cables and HVAC Cables will be completely buried underground for the entire length, rather than on overhead lines.	Construction Operation and Maintenance	
LSVIA	Primary		Construction	

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		Joint bays will be completely buried, with the land above reinstated. The link boxes will be accessed via manhole covers during the operation and maintenance phase.	Operation and Maintenance	
LSVIA	Primary	The converter stations will be constructed using a cut and fill technique to reduce their visibility in the landscape.	Construction	
LSVIA	Primary	Land-modelling will be employed to create higher areas of land around the converter stations. These 'false cuttings' will have the effect of screening the majority of the buildings from external viewpoints.	Construction Operation and Maintenance	
LSVIA	Primary	Planting will be provided at the Converter Site to assist with softening and screening the buildings. These measures will be set out in an Outline Landscape and Ecology Management Plan (LEMP) that will be prepared and submitted with the application for consent. The Outline LEMP will include: • Strengthening and enhancement of existing hedgerow field boundaries within the vicinity of the converter stations and at replacement hedgerows along the HVDC cable corridor. • Using native and locally appropriate plant species around converter stations and at replacement hedgerows along the HVDC cable corridor. • Identifying areas where it may be possible to achieve advance planting	Construction Operation and Maintenance	
LSVIA	Primary	Converter station building design to include the following: • Architectural design of converter station buildings. • Use of appropriate materials/colours/finishes for the façades of the converter station buildings.	Construction Operation and Maintenance	A Design Code will be submitted with application and detailed design secured as a Requirement of the DCO
Transport	Tertiary	Adoption of a CTMP which will set out suitable construction vehicle routes to be adhered to.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out that a pre-entry condition survey will be undertaken before the start of works and after the substantial completion of works on minor highway links and new junctions used by HGVs to access the Onshore Infrastructure Area. Any damage to the highway that has been demonstrably caused by construction traffic **associated with the Proposed Development** will be repaired.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out the construction working hours. These will be agreed in consultation with the relevant authorities. It is expected that in some circumstances, working hours could be extended when this will reduce the magnitude of environmental impacts of construction, such as to increase safety, reduce driver delays or reduce the duration of impacts.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out restrictions on HGV operating hours along those sections of the highway network that provide access to local schools. The CTMP will restrict HGV movements along the A386 through Bideford during school drop-off and pick-up times.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out restrictions on construction HGV movements through the Barnstaple Road/Manteo Way junction to limit these to no more than 10 per hour during the peak hours.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out restrictions on HGV operating hours and measures to minimise the number of HGV movements through sensitive areas when access to HDD sites is essential.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out the requirement for wheel cleaning methods at appropriate locations where it is necessary to eliminate the risk of mud and debris on the highway.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out measures to minimise dust and dirt associated with the movement of construction vehicles.	Construction	
Transport	Tertiary	The provision of appropriate parking facilities for construction workers.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out traffic management measures at those points where cable trenches are cut across highways or where existing access rights are affected.	Construction	
Transport	Tertiary	Adoption of a CTMP which will set out requirements to monitor load sizes and vehicle usage and, where possible, load consolidation and delivery to construction sites using alternative vehicles. Encouragement to re-use HGVs wherever possible, such as backloading. Where practical, local suppliers will be used to minimise the distance travelled by HGV.	Construction	An Outline CTMP will be developed and submitted with the DCO application. The detailed CTMP will be secured as a Requirement of the DCO.
Transport	Tertiary	The design of HGV access points, including visibility standards and, where necessary, temporary speed restrictions on the adjacent highway will be agreed with the relevant highway authorities.	Construction	Requirement to be set out in the On-CEMP(s). On-CEMP(s) to be secured as a DCO requirement.
Transport	Tertiary	The original highway will be reinstated after construction work is completed at all vehicle accesses where accommodation works are undertaken to allow the movement of vehicles between the Onshore Infrastructure Area and the highway.	Construction	

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Transport	Tertiary	For HDD crossings, the drilling compound is anticipated to receive a greater number of HGV movements than that receiving compound. Wherever practical, the drilling direction will be set to minimise the number of HGV movements through sensitive receptors	Construction	
Transport	Tertiary	A route for AILs will be identified. The route timing and method of transport of AILs will be discussed and agreed with the relevant highway and bridge authorities, as well as the police, to minimise delays to other road users.	Construction	An Outline CTMP will be developed and submitted with the DCO application. The detailed CTMP will be secured as a Requirement of the DCO.
Transport	Tertiary	It is expected that several AILs comprising large components will be transported to the Onshore Infrastructure Area. The heavy haulage contractor appointed to undertake this work will be required to comply with statutory regulations in terms of consulting with the relevant highway and bridge authorities, as well as the police.	Construction	
Transport	Tertiary	The routeing of AIL deliveries will be agreed with the relevant highway authorities. The delivery of AILs may be undertaken in convoy and under escort. Where AILs require the full width of the carriageway or for unusual manoeuvres at junctions, appropriate temporary road closures and traffic management will be put in place as appropriate to maintain the safety of other highway users.	Construction	
Benthic Ecology	Primary	Cable burial - Cables will be buried (where possible) up to 1.5 m below the seabed, subject to a detailed Cable Burial Risk Assessment (CBRA). Only when full burial is not possible will additional protection be installed.	Construction	Proposed Development design to be provided and secured as a DCO requirement.
Benthic Ecology	Primary	Cable protection measures - Where possible cable protection structures would be kept level with the seabed, and if above the seabed they would be kept to a maximum of 1 m above seabed level.	Construction	
Benthic Ecology	Primary	There will be micro-routing of the cable to minimise any potential damage to Annex I habitats.	Construction	To be secured as a requirement of the DCO – via final CEMP protocols.
Benthic Ecology	Tertiary	All ships subject to the Ballast Water Management Convention (2017) requirements will be obliged to conduct ballast water management in accordance with the contractual provisions and those within the Convention.	Operation and Maintenance	Proposed Development design to be provided and approved as part of the DCO.
Benthic Ecology	Tertiary	An Offshore CEMP will detail the best practice approach to offshore activities and would implement those measures and environmental commitments identified in the EIA. The following measures will be included in the Offshore CEMP: marine pollution prevention; waste management; marine invasive species; and dropped object procedures. An Outline Offshore CEMP will form part of the DCO (with a final Offshore CEMP finalised by offshore contractor).	Construction	Within the Outline Offshore CEMP to be provided as part of application for development consent. The Offshore CEMP will be secured as DCO requirement.
Benthic Ecology	Tertiary	In order to reduce the likelihood of introducing Marine Invasive Non-Native Species (MINNS) during all phases of the Proposed Development, an Offshore Biosecurity Plan will be adhered to with the incorporation of a biosecurity risk assessment.	All	Offshore Biosecurity Plan.
Benthic Ecology	Tertiary	A Marine Pollution Contingency Plan (MPCP) will be produced as part of the Offshore CEMP and will include measures to minimise the impact of any events as well as compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL).	Construction	To be secured as a requirement of the DCO – via final CEMP.
Benthic Ecology	Tertiary	For compliance with the requirements of MARPOL, all Project vessels with a gross tonnage (GT) above 400 tonnes would require a Shipboard Oil Pollution Emergency Plan (SOPEP) detailing the emergency actions to be taken in the event of an oil spill.	All	Proposed Development design to be provided and approved as part of the DCO.
Benthic Ecology	Tertiary	The use of a HDD drill fluid system that allows for the monitoring of pressure loss and therefore allows for the rapid identification of potential break outs	Construction	
Benthic Ecology	Tertiary	Vessel Management Plan (VMP) will confirm the types and numbers of vessels that would be engaged on the Proposed Development and consider vessel coordination including indicative transit route planning.	Construction	To be secured as a requirement of the DCO – via final CEMP.
Fish and Shellfish Ecology	Primary	Cable burial - Cables will be buried (where possible) up to 1.5 m below the seabed, subject to a detailed Cable Burial Risk Assessment (CBRA).	Construction	Proposed Development design to be provided and approved as part of the DCO.
Fish and Shellfish Ecology	Tertiary	All ships subject to the Ballast Water Management Convention (2017) requirements will be obliged to conduct ballast water management in accordance with the contractual provisions and those within the Convention.	Construction	
Fish and Shellfish Ecology	Tertiary	An Offshore CEMP will detail the best practice approach to offshore activities and would implement those measures and environmental commitments identified in the EIA. The following measures will be included in the Offshore CEMP: marine pollution prevention; waste management; marine invasive species; and dropped object procedures. An Outline Offshore CEMP will form part of the DCO (with a final Offshore CEMP finalised by offshore contractor).	Construction	Within the Outline Offshore CEMP to be provided as part of application for development consent. The Offshore CEMP will be

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				secured as DCO requirement.
Fish and Shellfish Ecology	Tertiary	To further minimise the risk of accidental spillage of hazardous materials, regulations that implement MARPOL and its various annexes and protocols will be followed.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Fish and Shellfish Ecology	Tertiary	The use of an HDD drill fluid system that allows for the monitoring of pressure loss and therefore allows for the rapid identification of potential break outs. Also use of self-sealing platelet grout lubricants (to minimise risk of break out).	Construction	
Fish and Shellfish Ecology	Tertiary	Vessel Management Plan (VMP) will confirm the types and numbers of vessels that would be engaged on the Proposed Development and consider vessel coordination including indicative transit route planning.	Construction	To be secured as a requirement of the DCO – via final CEMP.
Commercial Fisheries	Primary	Cables will be buried (where possible) to a target depth of 1.5 m below the seabed. This will reduce the likelihood of damage to the cable (and associated risks and accidents) associated with anchor strike, or fishing activity. Additional protection e.g. rock placement and / or mattresses where back cover of sediment requires to be supplemented.	Construction Operation and Maintenance	Design parameters taken forward into DCO and will form basis for specific contractor specifications.
Commercial Fisheries	Primary	Cable crossing design will adhere to international best practice design, which will allow them to be over trawlable.	Construction Operation and Maintenance	
Commercial Fisheries	Primary	Route optimisation studies, including multiple desktop studies and marine investigation surveys, have informed the routing of the Offshore Cable Corridor to ensure the Proposed Development avoids sensitive locations for commercial fisheries where possible.	Construction Operation and Maintenance	
Commercial Fisheries	Tertiary	Appointment of a Fisheries Liaison Officer (FLO) (construction phase). The FLO will support ongoing liaison and ensure clear communication between the Applicant and commercial fisheries during the construction phase.	Construction	An FLO has already been appointed to the project and will continue to be engaged for the duration of the construction phase as a minimum. Listed in outline Offshore CEMP (although likely continue to be contracted to main client) and FLO requirement may be listed in deemed Marine Licence under DCO.
Commercial Fisheries	Tertiary	Advance warning and accurate location details of construction, maintenance and decommissioning operations, associated safety/clearance zones and advisory passing distances will be given via Notices to Mariners, supported by Radio Navigational Warnings, NAVTEX and / or broadcast warnings as appropriate.	All	Contractor requirement to arrange Notice(s) to Mariners (NtM), typically issued by local harbour authorities – requirement of Offshore CEMP.
Commercial Fisheries	Tertiary	In the event that cable exposures are identified during the operational phase of the Project, the location of these will be shared with fisheries stakeholders and where appropriate, additional temporary measures put in place (e.g., marker buoys, use of guard vessels, etc.), until a repair or remediation can be implemented.	Operation and Maintenance	Notice(s) to Mariners (NtM) process will inform other marine users of ad-hoc / short-term works, their nature, location, duration and avoidance advice (where applicable).

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Commercial Fisheries	Tertiary	Development of a Vessel Management Plan which would set out pre-agreed vessel routes, speeds, safety measures, communication expectations etc.	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Commercial Fisheries	Tertiary	Compliance with international legislation, both for Project vessels and third-party vessels. This includes the COLREGs and SOLAS.	Construction	
Commercial Fisheries	Tertiary	Cable installation vessels and support vessels will display appropriate lights and marks at all times, and where possible, broadcast their status on AIS. This will include indication of the nature of the work in progress and highlight their restricted manoeuvrability.	Construction	
Commercial Fisheries	Tertiary	Guard vessel(s) will be employed to work alongside the installation vessel(s) during the construction period. These will alert third-party vessels to the presence of the installation activity and provide support in the event of an emergency.	Construction	
Commercial Fisheries	Tertiary	Marine coordination and communication to manage Project vessel movements.	Construction Operation and Maintenance	
Commercial Fisheries	Tertiary	Passing vessels will be requested to maintain a “safe” distance from installation vessels restricted in manoeuvrability. This will be monitored by guard vessels.	Construction	
Commercial Fisheries	Tertiary	The cable will be clearly marked on Admiralty Charts with associated note/warning about anchoring, trawling or seabed preparation.	Construction Operation and Maintenance	Ongoing consultations and commitments to data sharing with The Maritime and Coastguard Agency (MCA) and Trinity House. Data sharing commitment to the UK Hydrographic Office (UKHO) direct as required to update Admiralty Charts. Data sharing commitment secured via DCO.
Commercial Fisheries	Tertiary	A dropped objects procedure will be put in place detailing the requirements and procedures for vessel operators to identify, record, notify the MMO and, where possible, recover dropped objects.	Construction Operation and Maintenance	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Commercial Fisheries	Tertiary	Dedicated project FLOs will engage with local fishers to minimise potential disruption. Any claim of loss of / or damage to fishing gear will be processed, in line with protocols laid out within the guidance produced by the FLOWW group and “Recommendations for Fisheries Liaison: Best Practice”, in particular section 9: Dealing with claims for loss or damage of gear.	Construction Operation and Maintenance	Proposed Development design to be provided and approved as part of the DCO.
Marine Mammals and Sea Turtles	Tertiary	An Offshore CEMP will detail the best practice approach to offshore activities and would implement those measures and environmental commitments identified in the EIA. The following measures will be included in the Offshore CEMP: marine pollution prevention; waste management; marine invasive species; and dropped object procedures. An Outline Offshore CEMP will form part of the DCO (with a final Offshore CEMP finalised by offshore contractor).	Construction	Within the Outline Offshore CEMP to be provided as part of application for development consent. The Offshore CEMP will be secured as DCO requirement.
Marine Mammals and Sea Turtles	Tertiary	A Marine Pollution Contingency Plan (MPCP) will be produced as part of the Offshore CEMP and will include measures to minimise the impact of any events as well as compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL).	Construction	To be secured as a requirement of the DCO – via final Offshore CEMP.
Marine Mammals and Sea Turtles	Tertiary	Vessel Management Plan (VMP) will confirm the types and numbers of vessels that would be engaged on the Proposed Development and consider vessel coordination including indicative transit route planning.	Construction	
Shipping and Navigation	Primary	Suitable implementation and monitoring of cable protection as informed by CBRA, taking into account anchoring and fishing practices. Burial is preferred method of protection, with rock protection expected to be used at cable crossings and where target depth and burial with existing sediments is not possible.	Operation and Maintenance	Design parameters taken forward into DCO and will form basis for specific contractor specifications.

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Shipping and Navigation	Primary	Compass deviation effects will be minimised through cable design and burial, and separation distance between the two trenches. A compass deviation assessment will be undertaken post-consent, once the detailed design and cable configuration is available, to confirm interference with magnetic position-fixing equipment is within acceptable limits. If it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor will be undertaken.	Construction	Compass deviation effects will be required to be minimised in line with MCA requirements, which will be required to be met as part of the consent conditions.
Shipping and Navigation	Tertiary	Development of a Vessel Management Plan which would set out pre-agreed vessel routes, speeds, safety measures, communication expectations etc.	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Shipping and Navigation	Tertiary	Relevant policy guidance on water depth reduction to be followed during the design and construction of the project. Following further survey and detailed engineering, if areas are identified where external protection is required and the MCA condition of no more than 5% reduction in water depth is not achievable, a location specific review of impacts to shipping and consultation with the MCA will be carried out and additional mitigations agreed as required.	Construction	Water depth reduction will be required to be in line with MCA requirements, which will be required to be met as part of the consent conditions.
Shipping and Navigation	Tertiary	Promulgation of information via NtM, Kingfisher bulletins, the Kingfisher Information Service – Offshore Renewable & Cable Awareness (KIS-ORCA) service, Radio Navigational Warnings on Very High Frequency (VHF) radio, Navigational Telex (NAVTEX), and/or broadcast warnings in advance of and during the offshore works. Details to be set out in the Vessel Management Plan.	Construction	Pre-requisite contractor requirement – secured via final Offshore CEMP. Details of how information will be promulgated will be set out in the Vessel Management Plan (as part of Offshore CEMP).
Shipping and Navigation	Tertiary	Compliance with international legislation, both for Project vessels and third-party vessels. This includes the COLREGs and SOLAS.	Construction	Legal requirement to comply with international legislation.
Shipping and Navigation	Tertiary	An FLO will be appointed to allow for the communication and liaison between the applicant and commercial fisheries during the construction phases.	Construction	An FLO has already been appointed to the project and will continue to be engaged for the duration of the construction phase as a minimum. Listed in outline Offshore CEMP (although likely continue to be contracted to main client) and FLO requirement may be listed in deemed Marine Licence under DCO.
Shipping and Navigation	Tertiary	Cable installation vessels and support vessels will display appropriate lights and marks at all times, and where possible, broadcast their status on AIS. This will include indication of the nature of the work in progress and highlight their restricted manoeuvrability.	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Shipping and Navigation	Tertiary	Guard vessel(s) will be employed to work alongside the installation vessel(s) during the construction period. These will alert third-party vessels to the presence of the installation activity and provide support in the event of an emergency.	Construction	
Shipping and Navigation	Tertiary	Marine coordination and communication to manage Project vessel movements.	Construction	
Shipping and Navigation	Tertiary	Passing vessels will be requested to maintain a "safe" distance from installation vessels restricted in manoeuvrability. This will be monitored by guard vessels.	Construction	
Shipping and Navigation	Tertiary	The cable will be clearly marked on Admiralty Charts with associated note/warning about anchoring, trawling or seabed preparation.	Construction	Ongoing consultations and commitments to data sharing with The Maritime and Coastguard Agency (MCA) and Trinity House. Data sharing commitment to the

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				UK Hydrographic Office (UKHO) direct as required to update Admiralty Charts. Data sharing commitment secured via DCO.
Shipping and Navigation	Tertiary	Liaison with pilotage service at Bideford to reduce impact on vessel access and disruption to activities.	Construction	Good practice, and via NtM.
Shipping and Navigation	Tertiary	An MPCP will be produced as part of the final Offshore CEMP and will include measures to minimise the impact of any events as well as compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL).	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Other Marine Users	Primary	HDD methods will be employed to avoid any direct disturbance of the intertidal, the foreshore and the coastal cliffs.	Construction	Proposed Development design to be provided and secured as a DCO requirement.
Other Marine Users	Primary	Cable burial is the preferred method of cable protection. The cable will be buried at a target depth of up to 1.5m to reduce risks to the cable (e.g., anchor damage), subject to a detailed CBRA.	Construction	DCO licence. Pre-requisite contractor requirement - secured via final Offshore CEMP.
Other Marine Users	Primary	Cable crossing and proximity agreements with recognised subsea cables and pipeline operators will be obtained. Crossing design will adhere to international best practice.	Construction	
Other Marine Users	Tertiary	A Marine Pollution Contingency Plan (MPCP) will be produced as part of the Offshore CEMP and will include measures to minimise the impact of any events as well as compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL).	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Other Marine Users	Tertiary	For compliance with the requirements of MARPOL, all Project vessels with a gross tonnage (GT) above 400 tonnes would require a Shipboard Oil Pollution Emergency Plan (SOPEP) detailing the emergency actions to be taken in the event of an oil spill.	Construction	
Other Marine Users	Tertiary	Development of a Vessel Management Plan which would set out pre-agreed vessel routes, speeds, safety measures, communication expectations, etc.	Construction	
Other Marine Users	Tertiary	Promulgation of information via Notices to Mariners, Kingfisher, KIS-ORCA, Radio Navigational Warnings on Very High Frequency (VHF) radio, NAVTEX, and/or broadcast warnings in advance of and during the offshore works. Details to be set out in the Vessel Management Plan.	Construction	
Other Marine Users	Tertiary	The cable will be clearly marked on Admiralty Charts with associated note/warning about anchoring, trawling or seabed preparation.	Construction	Ongoing consultations and commitments to data sharing with The Maritime and Coastguard Agency (MCA) and Trinity House. Data sharing commitment to the UK Hydrographic Office (UKHO) direct as required to update Admiralty Charts. Data sharing commitment secured via DCO.
Other Marine Users	Tertiary	Compliance with international legislation, both for Project vessels and third-party vessels. This includes the COLREGs and SOLAS.	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.
Other Marine Users	Tertiary	Guard vessel(s) will be employed to work alongside the installation vessel(s) during the construction period. These will alert third-party vessels to the presence of the installation activity and provide support in the event of an emergency.	Construction	
Other Marine Users	Tertiary	Passing vessels will be requested to maintain a “safe” distance from installation vessels restricted in manoeuvrability. This will be monitored by guard vessels.	Construction	Pre-requisite contractor requirement and presence of a FLO - secured via final Offshore CEMP.
Other Marine Users	Tertiary	Sequential installation of cable, aiming to have cable laying vessels rotating on-site campaigns, minimising down time and requirement for guard vessels and safe passage distances.	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.

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Marine Archaeology and Cultural Heritage	Primary	Proactive management of Marine Archaeology and Cultural Heritage throughout the project. - Offshore Cable Corridor has undergone multiple route optimisations, which have included avoidance of known marine archaeological features. Micro-routing of the offshore cable corridor will be undertaken where possible and archaeological exclusion zones applied to avoid direct impacts on archaeology and cultural heritage assets and submerged land surfaces beneath marine sediments where possible.	Construction	Proposed Development design to be provided and approved as part of the DCO.
Marine Archaeology and Cultural Heritage	Primary	Avoidance of known sites of archaeological significance - Mitigation leading to preservation in situ will be advocated and Archaeological Exclusion Zones (recommended of at least 100 m) will be implemented around cultural heritage assets.	Construction	
Marine Archaeology and Cultural Heritage	Secondary	Archaeological assessment of available data - Offshore geophysical surveys (including future UXO surveys as necessitated) and any additional offshore geotechnical campaigns undertaken pre-construction will be subject to archaeological review, where relevant in consultation with Historic England. Relevant results from geotechnical surveys will be released / shared with ADS, with the aim to enhance the paleogeographic knowledge and understanding of the area.	Construction	To be secured as a requirement of the DCO, and separate marine licence where relevant.
Marine Archaeology and Cultural Heritage	Tertiary	Protocol for Archaeological Discoveries (PAD) - Additional unknown or unexpected cultural heritage and marine heritage receptors identified during the project stages will be reported utilising the project specific PAD, which will form part of the offshore CEMP.	Construction	To be secured as a requirement of the DCO – via final Offshore CEMP.
Marine Archaeology and Cultural Heritage	Tertiary	Identification and recording of sites of unknown archaeological significance - the final Offshore CEMP to include protocols should archaeological features be identified which will be linked to the Offshore Outline Archaeological WSI (a draft outline WSI accompanies this PEIR, which will be refined for the ES).	Construction	
Marine Archaeology and Cultural Heritage	Tertiary	Reporting and recording of items of potential archaeological interest - A draft Offshore Outline Archaeological WSI accompanies this PEIR. This will be refined for the ES, with site-specific WSIs produced prior to commencing construction, to inform specific investigation activities to record cultural heritage assets and subsequently the production of a post-excavation report.	Construction	
Physical Processes	Primary	Route optimisation studies have included consideration of substrate types, with e.g., outcropping bedrock avoided where possible.	Construction	Proposed Development design to be provided and secured as a DCO requirement.
Physical Processes	Primary	Micro-routing within the Offshore Cable Corridor will allow, where possible, the avoidance of sand waves or large ripples that would otherwise require pre-lay seabed flattening.	Construction	There will be multiple factors to consider within micro-routing including habitats, burial risk assessment, marine heritage and surface bed features. The micrositing principles will be set out within the final Construction Environmental Management Plan (CEMP) and accompanying documents including the archaeological WSI.
Physical Processes	Primary	HDD methods will be employed to avoid any direct disturbance of the intertidal, the foreshore and the coastal cliffs.	Construction	Part of DCO project description.
Physical Processes	Primary	Cable lay and burial will be undertaken within close timescales, avoiding any long-term exposed trenching.	Construction	Secured within DCO requirements and outline Offshore CEMP.
Physical Processes	Primary	Installation will utilise specialist ROVs which will minimise trench width and sediment disturbance (compared to less precise trenching tools).	Construction	
Physical Processes	Primary	Where additional rock protection is required, the preference will be placement within the trench i.e. with the finished level of rock cover will be below seabed level. The least favourable option (where protection / full protection via other techniques is not possible) is to result in rock protection above the level of the existing sea bed.	Construction	

Topic	Type of Measure (Primary, Secondary, or Tertiary)	Mitigation / Commitment	Phase	Proposed Securing Mechanism
Physical Processes	Primary	Where crossings of existing in-service cables are required, these will be constructed adhering to international best practice design (and may include concrete mattresses and/or shallow rock berms and are deemed over trawlable)	Construction	
Offshore Ornithology	Primary	Impacts on sensitive ornithology receptors (particularly designated sites) have been minimised when determining the offshore cable corridor. For example, SPAs designated for breeding seabirds have been avoided, which will result in no direct impacts at breeding colonies.	Construction	Proposed Development design to be provided and secured as a DCO requirement.
Offshore Ornithology	Tertiary	Adherence to standard pollution prevention measures (which will be ensured via an Offshore CEMP)	Construction	Secured within DCO requirements and outline Offshore CEMP
Offshore Ornithology	Tertiary	Development of and adherence to a Vessel Management Plan (VMP). The VMP will confirm the types and numbers of vessels that will be engaged on the Proposed Development and consider vessel coordination including indicative transit route planning.	Construction	Pre-requisite contractor requirement - secured via final Offshore CEMP.